IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SHANE GALITSKI, RICHARD	§	
TALIAFERRO and BRIAN NEWBOLD,	§	
Individually and on behalf of All Others	§	
Similarly Situated,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	CASE NO. 3:12-CV-4782-D
	§	
SAMSUNG TELECOMMUNICATIONS	§	
AMERICA, LLC,	§	
	§	
Defendant.	§	

Plaintiffs' Motion to Compel Defendant Samsung Telecommunications America, LLC to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition

TO THE COURT:

Plaintiffs Shane Galitski, Richard Taliaferro and Brian Newbold move the Court to compel Defendant Samsung Telecommunications America, LLC to produce a witness knowledgeable about the design of each model of the Samsung Galaxy S phone. Plaintiffs are entitled to the requested order for the reasons discussed in plaintiffs' brief in support of this motion to compel, filed concurrently with this motion.

A proposed order will be submitted separately.

Date: April 9, 2014 Respectfully submitted,

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CERTIFICATE OF CONFERENCE

On March 14, 2014, counsel for plaintiffs, Jennifer L. MacPherson, met and conferred

with counsel for defendant Samsung, Alan Dabdoub, regarding the subject of Topic 12 in

plaintiffs' Rule 30(b)(6) deposition notice. The parties were unable to reach agreement on a

resolution of the scope of Topic 12. Counsel for Samsung suggested plaintiffs' counsel narrow

Topic 12 and include it in an amended deposition notice for consideration by Samsung. This was

done, but Samsung reiterated the same objections to revised Topic 12.

Certified this 9th day of April, 2014.

/s/ James R. Hail

James R. Hail

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing

document has been served on all counsel of record in accordance with the FEDERAL RULES OF

CIVIL PROCEDURE on April 9, 2014:

/s/ James R. Hail

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